

REMARKS/ARGUMENTS

This application has been carefully considered in connection with the Final Action issued by the Examiner on December 15, 2005. Reconsideration and allowance are respectfully requested in view of the following.

Claims 1 and 3-19 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,504,479 to Lemons et al. and Claims 20-24 and 26-31 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Lemons et al. in view of U.S. Patent No. 6,826,173 to Kung et al. In response, the Applicants respectfully traverse the various rejections of Claims 1, 3-24 and 26-31 and instead submit that Claims 1, 3-24 and 26-31 are patentably distinguishable over the cited art. The Applicants further submit that newly added Claims 47-61 are also distinguishable over the cited art. Accordingly, the Applicants respectfully request the reconsideration and withdrawal of the various rejections of Claims 1, 3-24 and 26-31 and the allowance of Claims 1, 3-24, 26-31 and 47-61.

The Applicants have disclosed and claim herein a security system which includes a security gateway and a security system server. The security gateway is configured to notify the security system server of an alarm condition and to transfer an Alarm Video to the security system server in substantially real time through the first network. The security gateway is further configured to notify the security system server of the alarm condition through a second network. Finally, the security gateway is still further configured to notify the security system server of the alarm condition through the first network substantially simultaneously with notifying the security system server of the alarm condition through the second network.

The cited art has been carefully considered but neither teaches nor suggests Applicants' invention as defined herein. More specifically, the Applicants respectfully submit that nowhere does Lemons et al. teach or suggest a security system in which the security gateway transmits substantially simultaneous notifications of an alarm condition through both a first network and a second network.

Lemons et al. does disclose a first communications channel 36 operatively coupling communication termination equipment (CTE) 36 and CTE 40 as well as a second communications channel 50 operatively coupling CTE2 52 and CTE2 54. However, Lemons et al. is extremely sketchy as to specific details as to exactly how an alarm notification is transmitted from the CTE2 52 to the CTE2 54 over the second communications channel 50. For ease of analysis of the teachings of Lemons et al. relative to this issue, all passages of Lemons et al. related to the transmission of a notification over the second communications channel 50 are set forth below in their entirety.

In addition to the common communications channel 36, a backup or redundant communications channel 50 may be employed. The channel 50 is connected between the facility 12 and the monitoring center 38 by using communications termination equipment (CTE2) 52 located within the facility 12 and communications termination equipment (CTE2) 54 located within the monitoring center 42. The CTE2 52 may be connected to the SCU 14 via a connection 56. Although not shown, the CTE2 54 may be connected to the video server 42, the customer database 44, and the central alarm computer 46 as the CTE 40. Thus all functions of the integrated security system 10 can be maintained even when the primary communications link 36 fails, is not available, or is interrupted. Examples of the communications termination equipment 34, 40, 52 and 54 may be an ISDN router or a phone line dial-up.

Lemons et al., col. 4, line 66 – col. 5, line 14 (emphasis added).

The controller 200 is also capable of transmitting and receiving information over the connection 32 through the CTE 34. The CTE 34 is in turn connected to the

communications channel 36, although such connection is not illustrated in FIG. 9. The CTE 2 52 is connected to the SCU controller 200 via the connection 56. In case the channel 36 is broken, interrupted or otherwise impaired, the controller 200 is connected to the monitoring center 38 via the CTE2 52 and the communications channel 50.

Lemons et al., col. 9, lines 51 – 58 (emphasis added).

While not specifically stated by Lemons et al., there are a number of relatively common methods by which a controller such as the SCU controller 200 would be notified of a break in a primary communications channel such as the communications channel 36 and would proceed with the transmission of information over a backup communications channel such as the backup communications channel 52. In accordance with one such method, after transmitting information over the communications channel 36, the SCU controller 200 would expect to receive a message from the CTE 40 confirming that the information transmitted over the communications channel 36 had been received. If no confirmation is received, the SCU controller 200 would conclude that the communications channel 36 is broken and the information would need to be retransmitted, this time over the backup communications channel 52. In another such method, prior to transmitting the information over the communications channel 36, the SCU controller 200 would attempt a “handshake” with the CTE 40, thereby confirming that the CTE 40 is ready to receive the information. If no reply is received from the CTE 40, the SCU controller 200 would conclude that the communications channel 36 is broken and the information must be transmitted over the backup communications channel 52. Finally, in still another such method, the SCU controller 200 would periodically “ping” the CTE 40 over the communications channel 36 and, in the event of the absence of a reply, the SCU controller 200 would conclude that the communications channel 36 is broken and that all subsequent transmissions must be made over the backup communications

channel 52.

The aforementioned methods may be seen as collectively teaching that, when a transmitter and receiver are coupled together by redundant communications channels, it is the failure of some type of a signal transmission over the primary line communication channel that is used to advise the transmitter that the primary communication channel has failed and that the secondary communication channel must be used to transmit data to the receiver. Indeed, the highlighted portions of the cited passages of Lemon et al. are all clearly supportive of the use of those techniques in which, prior to use of the secondary communications channel, the transmitter must be advised that the primary communications channel has failed, is unavailable, has been interrupted, broken or is otherwise impaired. In contrast with conventional security systems which include redundant communication lines, Applicants' invention is directed to a security system in which a signal, specifically, the notification of an alarm condition notification, is transmitted substantially simultaneously over the first network and the second network. Whether or not the first network has failed is not a factor in determining that the alarm notification is to be transmitted over the second network. Thus, rather than being transmitted over the second network only when the first network has failed, in accordance with Applicants' invention, the alarm notification shall also be transmitted over the second network when the first network is still in operation. The foregoing limitation is specifically recited in Claim 1, lines 13-15; Claim 20, lines 18-20; Claim 59, lines 1-4 and Claim 61, lines 1-4. It is submitted, therefore, that Claims 1, 3-24, 26-31, 47-52, 59 and 61 are allowable for this reason.

Still other limitations that are neither taught nor suggested by the cited art are set forth in

others of the newly added claims. More specifically, newly added Claims 47, 49-50, 52-54 and 56 all recite that the security gateway is further configured to detect if connectivity with the security system server through the first network is lost and notify the security system server through the second network of the loss of connectivity through the first network, newly added Claims 48-49 51-52 and 54-56 all recite that the security gateway is further configured to notify the security system server in the event that connectivity with the security system server through the first network is lost while the security gateway is disarmed and the security gateway is armed before connectivity with the security system server through the first network is restored and newly added Claims 57-61 further recite that the security system includes a remotely located monitoring center coupled to the security gateway through a second network, that the security gateway delivers the alarm condition notification to the security system server through a first network and to the monitoring center through the second network and that the monitoring center delivers the alarm condition notification to the security system server. The foregoing limitations support the allowance of Claims 53-58 and 60 and further support the allowance of Claims 47-52, 59 and 61.

For the reasons set forth herein, it is submitted that Claims 1, 3-24, 26-31 and 47-61 are neither taught nor suggested by the cited art. Accordingly, the Applicants respectfully request the reconsideration and withdrawal of the various rejections of Claims 1, 3-24 and 26-31 and the allowance of Claims 1, 3-24, 26-31 and 47-61.

While the foregoing amendment and associated remarks are believed to clearly establish the patentability of Claims 1, 3-24, 26-31 and 47-61, if the Examiner believes that a telephonic


interview with the attorney of record will expedite the issuance of a Notice of Allowability, the Examiner is invited to call the undersigned.

A check in the amount of \$60 is enclosed to pay for a one-month extension of time (small entity) to file this Amendment. It is believed that there are no other fees due in connection with this Amendment. In the event that there are fees due in connection with this Amendment, the Commissioner is authorized to charge any such fees to Deposit Account No. 50-1515.

This application is now considered to be in condition for allowance. A prompt Notice to that effect is, therefore, earnestly solicited.

Respectfully submitted,

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